

EXHIBIT B

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

* * *

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL NO. 2804

CASE NO. 1:17-md-2804

THIS DOCUMENT RELATES TO:

MICHELLE FROST, LEGAL GUARDIAN OF
CHILD D.F., and STEPHANIE HOWELL,
LEGAL GUARDIAN OF CHILD C.L., on
Behalf of Themselves and All Other
Similarly Situated Legal Guardians,

PLAINTIFFS,

vs.

ENDO HEALTH SOLUTIONS, INC., et al.,

DEFENDANTS.

* * *

Deposition of ERIN DOYLE, witness
herein, called by the defendants for
examination pursuant to the Rules of Civil
Procedure, taken before me, Patti Stachler,
RMR, CRR, a Notary Public within and for the
State of Ohio, at the Quality Inn & Suites,
5100 Old Scioto Trail, Portsmouth, Ohio, on
January 24, 2020, at 10:41 a.m.

* * *

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1 Q. And did she represent you at all
2 in connection with that proceeding?

3 A. No. Anna Villarreal did not
4 represent me.

5 Q. Then we saw that Anna Villarreal
6 was counsel for Michelle Frost when Michelle
7 Frost was trying to get custody instead of you
8 having custody?

9 A. Yes.

10 Q. Did Anna Villarreal represent you
11 at all in connection with that proceeding?

12 A. No.

13 Q. Did Anna Villarreal represent you
14 in some other proceeding?

15 A. No.

16 Q. Has Anna Villarreal ever
17 represented you?

18 A. No.

19 (Doyle Exhibit 23 was marked for
20 identification.)

21 BY MR. KEYES:

22 Q. Ms. Doyle, I'm showing you what
23 has been marked as Doyle Exhibit 23. Do you
24 have Doyle Exhibit 23 in front of you?

25 A. Yes.

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1 Q. Okay. This -- I've shown you a
2 number of documents that were all from the same
3 custody proceeding.

4 A. Yes.

5 Q. Do you understand this is not part
6 of that custody proceeding, correct?

7 A. Yes.

8 Q. This is a separate action?

9 A. I don't really know how the
10 custody papers were relevant to this. That was
11 going to be my next question.

12 Q. So this is a document that was
13 filed in the Common Pleas Court of Ross County,
14 Ohio?

15 A. Yes.

16 Q. And it lists you as the plaintiff
17 for this action? Do you see that Erin Doyle at
18 the top as plaintiff?

19 A. Yes.

20 Q. It says this was filed on May 9th,
21 2018 in the Court of Common Pleas for Ross
22 County, correct?

23 A. Yeah, I see that.

24 Q. And this was during the time of
25 your custody battles with Kyle Frost --

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1 A. Yes.

2 Q. -- when Kyle was being represented
3 by Anna Villarreal?

4 A. Yes.

5 Q. Would you turn to the last page of
6 this exhibit, page 63?

7 A. Yes.

8 Q. And this says, Respectfully
9 submitted by, and the first name listed as your
10 counsel is Anna Villarreal?

11 A. Yes.

12 Q. Do you see that?

13 A. Yes.

14 Q. Did you know that Ms. Villarreal
15 had signed this complaint?

16 A. No.

17 Q. Did you know that Ms. Villarreal
18 had filed this complaint?

19 A. No.

20 Q. Did you know that Ms. Villarreal
21 had filed a complaint listing you as the
22 plaintiff?

23 A. No.

24 Q. Did you review any of the
25 allegations in this complaint before it was

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1 filed?

2 A. No. This is the first I've seen
3 or heard of it.

4 Q. Have you ever seen Doyle
5 Exhibit 23 before?

6 A. No, I haven't.

7 Q. Okay. Did -- I asked you before
8 whether you had seen this, you said no; whether
9 you knew about it, no. Did you have any
10 discussions with anyone else about filing a
11 lawsuit -- or filing this particular complaint
12 that is Doyle Exhibit 23?

13 A. No. I've never spoke about it,
14 seen it, heard tell of it.

15 Q. And did you have any knowledge
16 that anyone else was filing a complaint on your
17 behalf in the Common Pleas Court of Ross
18 County?

19 A. Absolutely not.

20 Q. I'm going to call your attention
21 to some -- did you understand that this lawsuit
22 was being filed by you on your own behalf but
23 also on behalf of others similarly situated?

24 A. No.

25 Q. If you turn -- if you see at the